

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

JANE DOE and)	
JOHN DOE)	
)	
Plaintiffs)	
)	Civil Action No. 1:22-CV-00535
v.)	
)	
GOOGLE, LLC,)	
KMT WIRELESS, LLC d/b/a)	
CYNERGY, AND)	
DFW JOB INTERLOCK CORP.)	
)	
Defendants)	
)	

JOINT MOTION OF THE PARTIES TO EXTEND THE STAY OF THE CASE

NOW COME Plaintiffs, Jane Doe and John Doe, and Defendants Google, LLC (“Google”), KMT WIRELESS, LLC d/b/a CYNERGY (“Cynergy”), and DFW JOB INTERLOCK CORP. and hereby move for the Court to extend the stay of this action until May 30, 2025 to allow the parties to conduct mediation. The parties jointly propose that they file a status report or motion at that time either requesting a further stay, if appropriate, or requesting a tracking order if the stay is to be lifted. As grounds for this Motion, the parties state as follows:

1. This is an action in which Jane Doe and John Doe allege claims for negligent hiring and supervision, Violation of NH Consumer Protection Act (NH RSA 358-A), invasion of privacy, intentional infliction of emotional distress and negligent infliction of emotional distress against defendants Google, Cynergy, and DFW Job Interlock, Corp.

2. The Plaintiffs and Defendants Google and Cynergy previously moved to stay the case for the period of a year. *See* Doc. 20, filed 6/28/23. This Court granted the request on June 29, 2023.
3. Subsequently, the parties filed an Amended Assented to Motion to Stay the case for an additional year on March 19, 2024, which the Court granted on or about April 1, 2024.
4. The stay currently expires on or about March 20, 2025.
5. The parties have agreed to conduct private mediation on or about May 23, 2025.
6. Without waiver of rights or defenses, the parties have agreed to extend the stay until May 30, 2025 in order to allow the parties to conduct mediation.
7. It is in the best interests of the court and the parties to this action to stay the case while the parties endeavor to resolve this matter through mediation.
8. No prejudice will result from the stay of this case until May 30, 2025.
9. Should the mediation be postponed or cancelled for any reason, the parties will promptly notify the court and either request another extension of or to lift the stay.
10. An accompanying memorandum to this motion is unnecessary as both Plaintiffs and Defendants have joined this motion and no party will file an objection to this motion.

For the above-stated reasons the Plaintiffs, Jane Doe and John Doe hereby request that this Court:

- A) Grant this joint motion of the parties to stay the case until May 30, 2025 in order to allow the parties to conduct mediation;

- B) Order the parties to submit either a joint status report, request for further extension, or request to lift the stay on or after May 30, 2025; and
- C) Grant such other relief as is just and equitable.

Respectfully submitted,
JANE AND JOHN DOE
By their attorneys,
Lyons Law Offices, P.A.

Dated: 3/17/25

By: /s/John E. Lyons

John E. Lyons, Esq. (NH Bar #1535)
One New Hampshire Avenue, Suite 235
Portsmouth, NH 03801
Phone: (603) 431-5144
Fax: (603) 431-5181
Email: jlyons@lyonslaw.net
abourdages@lyonslaw.net

AND

Getman, Schulthess, Steere & Poulin, P.A.

Dated: 3/17/25

By: /s/ Clara E. Lyons

Clara E. Lyons, Esq. (NH Bar #20054)
1838 Elm Street
Manchester, NH 03104
Phone: (603)634-4300
Email: Clyons@gssp-lawyers.com

CERTIFICATE OF SERVICE

I, Clara E. Lyons, Esq., hereby affirm that a copy of the assented to motion to extend service deadline has been forwarded this day to all counsel of record via the Court's ECF system. I further swear and affirm that Defendants' counsel has assented to this motion.

Dated: 3/17/25

By: /s/ Clara E. Lyons

Clara E. Lyons, Esq.
Bar No. 20054